

BELDOCK LEVINE & HOFFMAN LLP
99 PARK AVENUE, PH/26TH FLOOR
NEW YORK, N.Y. 10016

CYNTHIA ROLLINGS
JONATHAN MOORE
JONATHAN K. POLLACK
HENRY A. DLUGACZ
STEPHEN J. BLUMERT
MARC A. CANNAN
DAVID B. RANKIN
LUNA DROUBI
MYRON BELDOCK (1929-2016)
LAWRENCE S. LEVINE (1934-2004)
ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400
FAX: (212) 277-5880
WEBSITE: blhny.com

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 01/21/2020

COUNSEL
BRUCE E. TRAUNER
PETER S. MATORIN
KAREN L. DIPPOLD
JEFFREY A. GREENBERG
MARJORY D. FIELDS
EMILY JANE GOODMAN
(JUSTICE, NYS SUPREME COURT, RET.)
FRANK HANDELMAN

REF:
9000.2300
WRITER'S DIRECT DIAL:
212-277-5875

VIA ECF

Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

January 17, 2020

APPLICATION GRANTED: The telephone conference call previously scheduled for Tuesday, January 21, 2020 at 12:30 p.m. is rescheduled to Tuesday, January 21, 2020 at 4:00 p.m. Counsel for the parties are directed to call Judge Parker's Chambers at the scheduled time with counsel for all parties on the line. Please dial 212-805-0234.

APPLICATION GRANTED

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.
01/21/2020

Re: *Elsayed et al. v. City of New York et al.*, 18-cv-10566 (AT) (KHP)
[rel. 18-cv-2334]

Judge Parker:

We represent Plaintiffs in the above-referenced action. We submit this letter-motion to request a modest adjournment of the telephone conference scheduled with the Court and Parties for Tuesday, January 21, 2020 at 12:30 p.m. Lead counsel for the Plaintiffs will be attending NYPD training sessions in another matter. We respectfully request that the call be rescheduled to either later in the afternoon on Tuesday, January 21, 2020 or later in the week, as is convenient for the Court.

Per the Court's orders during the telephone conference on January 13, 2020, the Plaintiffs provided the Defendants with a draft of our proposed class definition on January 14, 2020 and a proposed stipulation of settlement on January 17, 2020, which includes the class definition and other details regarding notice and review period, to the extent Plaintiffs have information to inform those proposals. Plaintiffs also provided Defendants with a letter demanding class discovery on January 14, 2020.

We noticed all counsel in this case today that we were seeking a modest extension because of a conflict with another litigation in this office. Counsel for *Clark* have not responded. Counsel for the City responded as follows:

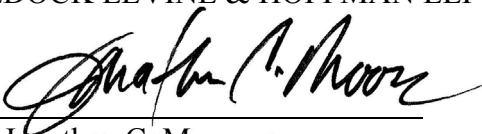
Hon. Katharine H. Parker
January 17, 2020
Page 2

“Given the size of your team, I see no reason to adjourn Tuesday’s conference and we are not available later in the day. Everyone on our team is currently prepping for trial.”

We appreciate the Court’s attention to this matter.

Respectfully submitted,

BELDOCK LEVINE & HOFFMAN LLP

By: 

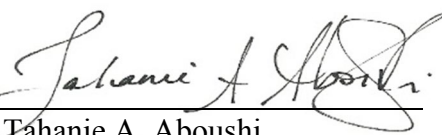
Jonathan C. Moore

Luna Droubi

Marc Arena

99 Park Avenue, PH/26th Floor
New York, New York 10016

THE ABOUSHI LAW FIRM, PLLC

By: 

Tahanie A. Aboushi

1441 Broadway Suite 5036
New York, New York 10018

*Attorneys for Plaintiffs Gehad Elsayed and
Laila Ibrahim, on behalf of themselves and
others similarly situated*

cc: All Parties (via ECF)
Counsel for *Clark* Plaintiffs (via Email)